

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ADWOWA JACOBS,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION AND JEFF
WILLIAMS,

Defendants.

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CIVIL ACTION NO.

2:05-CV-925-MHT-SRW

**DEFENDANTS' JOINT MOTION TO HOLD PLAINTIFF'S
DEPOSITION AT THE FEDERAL COURTHOUSE**

Electronic Data Systems Corporation ("EDS") and Jeff Williams ("Williams"), Defendants in the above-entitled and numbered cause, file this Joint Motion to Hold Plaintiff's Deposition at the Federal Courthouse and, in support thereof, would respectfully show the Court as follows:

I.

Plaintiff, Adwowa Jacobs, is currently employed by EDS as a Call Center Representative in its Montgomery, Alabama facility. On September 27, 2005, Plaintiff filed this action against EDS and Williams alleging: (1) sexual harassment; (2) negligent hiring, training and supervision; (3) wanton hiring, training and supervision; (4) outrage; (5) assault and battery; and (6) invasion of privacy. [Docket No. 1]. By agreement of the Parties, Plaintiff's deposition is currently scheduled to take place on Wednesday, October 4, 2006 in Montgomery, Alabama. The time and location have yet to be determined.

II.

Because Defendants' have serious concerns about threats of bodily harm being advanced by Plaintiff in the workplace, Defendants' herein request that the Court allow use of the Federal Courthouse for purposes of taking Plaintiff's deposition. More specifically, EDS has confirmed that Plaintiff not only holds a gun permit issued by the State of Alabama, but Plaintiff has made several statements to current employees threatening to use the same against others. Consequently, Defendants have grave concerns about taking Plaintiff's deposition in an unsecured location given threats of violence made by Plaintiff to co-workers.

III.

Given that Plaintiff is a current employee and there appears to be animosity toward Defendant, Jeff Williams, as well as EDS corporate representatives, which may attend her deposition, Defendants respectfully request that the Court permit use of a conference room in the Courthouse for purposes of taking Plaintiff's deposition on October 4, 2006.

IV.

For the reasons stated above, Defendants respectfully request that this Court grant Defendants' Motion to Hold Plaintiff's Deposition at the Federal Courthouse and for all other relief to which they may show themselves to be justly entitled.

Respectfully submitted,

Baker & Hostetler LLP

By: /s/Rachel M. Smith

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been sent by certified mail, return receipt requested, to the following counsel of record on this the 20th day of September, 2006.

L. D. Walker, III
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/s/Rachel M. Smith
Rachel M. Smith